

JACOBS & BARBONE, P.A.

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

1125 PACIFIC AVENUE

ATLANTIC CITY, NEW JERSEY 08401

PHONE: (609) 348-1125

FAX: (609) 348-3774

E-MAIL: JACOBSBARBONE@COMCAST.NET

EDWIN J. JACOBS, JR.

LOUIS M. BARBONE

ARTHUR J. MURRAY

ERIC H. LUBIN

MICHAEL F. MYERS

YOONIEH AHN

March 23, 2014

Sent via ECF

Honorable Faith S. Hochberg
United States District Court
U.S. Post Office & Court House Building
Room 311
P.O. Box 999
Newark, N.J. 07101-0999

Re: U.S.A v. Joseph Wolfson, et al.
Criminal No. 2:13-cr-748-FSH
Our File No. 13,114

Dear Judge Hochberg:

We represent Defendants Joseph Wolfson, Richard Simon Trustee and Betty Simon, Trustee LLC in the above captioned matter. Respectfully, we do not consent to the Government's proposed protective Order.

The aforementioned defendants are also defendants in a parallel class action lawsuit filed in the District Court of New Jersey.¹ The Government's proposed Order, as currently worded, would greatly restrict their ability to properly represent themselves in that action. Further, a protective Order is unnecessary in this matter as the statute of limitations has expired. Thus, there is no risk of compromising an ongoing investigation by the Government.

Respectfully,
JACOBS & BARBONE, P.A.

/s/ Michael F. Myers
Michael F. Myers, Esquire
Edwin J. Jacobs, Jr., Esquire

cc: All counsel
cc: Joseph Wolfson

¹ IN RE NEW JERSEY TAX SALES CERTIFICATES ANTITRUST LITIGATION, CIVIL DOCKET #: 3:12-cv-01893-MAS-TJB